



STATE OF WASHINGTON
PUBLIC DISCLOSURE COMMISSION

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May 18, 2006

MICHAEL A JONES
7105 229TH PL SW
MOUNTLAKE TERRACE WA 98403

Subject: Complaint filed against the Angela Amundson campaign – PDC Case No. 06-289

Dear Mr. Jones:

The Public Disclosure Commission (PDC) staff has completed its investigation of your complaint received November 7, 2005, alleging: 1) that the Angela Amundson campaign failed to keep its appointment to allow inspection of its records; 2) that when the records were reviewed, they were not complete and did not account for all of her ads, including an ad mailed using a bulk mail permit featuring Ms. Amundson and two other candidates; and 3) that two ads show Ms. Amundson and two other candidates, but only showed Ms. Amundson as the sponsor.

PDC staff reviewed the complaint in light of the following statutes:

RCW 42.17.080(5) states: The treasurer or candidate shall maintain books of account accurately reflecting all contributions and expenditures on a current basis within five business days of receipt or expenditure. During the eight days immediately preceding the date of the election the books of account shall be kept current within one business day. As specified in the committee's statement of organization filed under RCW 42.17.040, the books of account must be open for public inspection by appointment at the designated place for inspections between 8:00 a.m. and 8:00 p.m. on any day from the eighth day immediately before the election through the day immediately before the election, other than Saturday, Sunday, or a legal holiday. It is a violation of this chapter for a candidate or political committee to refuse to allow and keep an appointment for an inspection to be conducted during these authorized times and days. The appointment must be allowed at an authorized time and day for such inspections that is within twenty-four hours of the time and day that is requested for the inspection.

RCW 42.17.510 states in part that all written political advertising, whether relating to candidates or ballot propositions, shall include the sponsor's name and address.



Inspection of Campaign Records

You alleged that Ms. Amundson failed to make her campaign records available for inspection within 24 hours of your request for an appointment, that the records were not complete, and that the records did not include all of her expenditures. We found that:

- On August 10, 2005, Angela Amundson filed a Candidate Registration Statement (PDC form C-1) declaring her candidacy for re-election to the Mountlake Terrace City Council. She selected the mini reporting option. The Amundson campaign received contributions totaling \$3,475, largely comprised of personal funds from Ms. Amundson. No contribution, other than those from Ms. Amundson, exceeded \$300. Expenditures totaled \$2,884.
- On the evening of October 31, 2005, you requested an appointment to review Ms. Amundson's campaign books. Ms. Amundson made an appointment to meet with you the following morning, but did not have access to her day-timer when she made the appointment. After Ms. Amundson reviewed her day-timer, she realized she had a scheduling conflict and contacted you the following morning, about an hour before the appointment time, to inform you that she could not keep the appointment, and to discuss scheduling a new time to review the records.
- Ms. Amundson said you were not happy that she was unable to keep the appointment. She said she felt uncomfortable with the tone of the conversation, and did not want to meet with you at her residence. She contacted you later in the day on November 1, 2005 and re-scheduled the records inspection for later that afternoon at 5:00 p.m. at the local police station. Ms. Amundson met with you at the police station at 5:00 p.m. on November 1, a few hours more than 24 hours from the time you initially requested an appointment.

It appears that Ms. Amundson failed to make her campaign records available within 24 hours of your initial request. However, this was due to a scheduling conflict that she was unaware of when she made the appointment, and she contacted you within the 24 hour period to re-schedule the appointment. She made her records available for inspection later that afternoon. Thus, no enforcement action is warranted.

Completeness and Accuracy of Records

You alleged that when you reviewed Ms. Amundson's records, they were not complete and did not account for all of her ads. We found that:

- Ms. Amundson provided you with a hand written copy of her campaign check register that as of the date of the inspection included expenditures totaling \$2,110.38. Ms. Amundson states that she contacted PDC staff before meeting with you and, based on her conversation, believed that as a filer under the mini reporting option she was required to provide only a copy of her check register

showing all contributions deposited and expenditures made. PDC staff is unable to confirm whether Ms. Amundson was given advice about what records she was required to make available during the inspection period.

- You alleged that Ms. Amundson's records failed to disclose expenditures made to The Enterprise for newspaper advertising. On August 31, 2005, the Amundson campaign made a \$210 payment to The Enterprise to insert 10,000 double sided flyers into the September 2, 2005 newspaper. On two occasions, The Enterprise failed to insert the flyers as agreed. As a result of these errors, The Enterprise and Ms. Amundson agreed that the campaign would be provided space for eight separate ads at no additional cost.
- The eight advertisements that you alleged were not accounted for in Ms. Amundson's records were accounted for by the campaign's \$210 payment to The Enterprise. This payment was listed in the records made available for inspection. A review of a September 30, 2005 billing statement from The Enterprise showed charges for the eight "make-up" ads, along with corresponding credits since there were no additional charges to the campaign.
- The Amundson campaign made a third attempt to include inserts in The Enterprise. The campaign paid Office Depot \$420.80 on November 1, 2005 to print 10,000 insert flyers. This expenditure was included in the check register made available for inspection. On November 2, 2005, the campaign reimbursed Theresa Rinds \$429.95 for a credit card payment to The Enterprise for the cost of including the inserts in the newspaper. This expenditure was not included in the check register you reviewed because it occurred one day after you inspected the records. Ms. Amundson said she did not receive a copy of the invoice until after you had inspected the records. Ms. Amundson stated that The Enterprise again failed to include the inserts in the newspaper.
- Ms. Amundson and two other candidates, Loryane Ham and Maria Quintero, were featured in an ad using a bulk mailing permit. Ms. Amundson's records verified that she paid her share of the expenses, \$247.49, on November 3, 2005, two days after you inspected the records. Ms. Amundson stated that she did not receive a copy of the invoice until after you had inspected the records.

The Amundson campaign was required to make its records, such as its check register, invoices, and receipts available for inspection. Ms. Amundson disclosed only a copy of her checkbook register because that is what she believed was required, based on a call she states she made to PDC staff. The copy of her checkbook register made available for your inspection showed all deposits to and expenditures made from her bank account as of that date. PDC staff believes that no enforcement is warranted. Ms. Amundson will be reminded that records supporting her check register must be made available in future campaigns.

Sponsor Identification of Ads

You alleged that two ads in The Enterprise newspaper featured Ms. Amundson, Ms. Ham and Ms. Quintero, but showed only Ms. Amundson as the sponsor. We found that:

- Two ads run September 16 and September 23, 2005 and one ad run November 4, 2005 in The Enterprise featured Angela Amundson, Lorayn Ham and Maria Quintiero, but listed only Ms. Amundson as the sponsor. These ads were run by The Enterprise at no charge because of its earlier failure to include Ms. Amundson's inserts in the newspaper. Because Ms. Amundson paid to have the inserts included in the newspaper, she was properly listed as the sponsor of the ads.
- An ad was run in The Enterprise newspaper on October 7, 2005 featuring Ms. Amundson, Ms. Ham and Ms. Quintiero. It did not contain any sponsor identification. It was one of the eight ads run by The Enterprise for Ms. Amundson at no additional charge. Thus, Ms. Amundson was required to be listed as the sponsor.
- A mailing using a bulk mailing permit near the end of the campaign featured all three candidates. It was paid for by all three candidates but listed only Angela Amundson as the sponsor. Ms. Ham and Ms. Quintero were required to be listed as co-sponsors along with Ms. Amundson.

In accordance with standard PDC practice, Ms. Amundson, Ms. Ham and Ms. Quintero were sent sponsor identification warning letters. Thus, no additional enforcement is warranted.

After a careful review of the alleged violation and relevant facts, we have concluded our investigation and, with the concurrence of the Vice Chair of the Public Disclosure Commission, I am dismissing your complaint against Angela Amundson. Ms. Amundson is being notified of this dismissal by separate letter.

If you have questions, please contact Phil Stutzman, Director of Compliance, at (360) 664-8853 or toll-free at 1-877-601-2828 or by e-mail at pstutzman@pdc.wa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Vicki Rippie", written over a horizontal line.

Vicki Rippie
Executive Director